UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

VALENE REED, individually and on	
behalf of all others similarly situated,) Civil Action No. 10-cv-5642 (DLC)
)
Plaintiff,)
)
v.)
)
CONTINENTAL GUEST SERVICES)
CORPORATION,)
)
Defendant.)
)

PLAINTIFF'S UNNOPPOSED NOTICE OF SUPPLEMENTAL INFORMATION IN SUPPORT OF PRELIMINARY APPROVAL

- 1. On May 3, 2011, the Court conducted a conference to address several issues related to potential preliminary approval of the proposed class action settlement agreement that is currently before the Court.
- 2. This Court asked the Parties to make the following specific revisions to the proposed settlement: a) revisions to the Summary Notice appended as Exhibit B1 to simplify and streamline the information being provided to consumers regarding the settlement; b) revisions to the release language in the Class Action Settlement Agreement at Paragraphs 1.19 and 1.25 to clarify the scope of the release; c) possible changes to account for potential international class members; and, d) clarification regarding whether a denial of Class Counsels' fee request would impact the finality of the settlement. This Notice is being filed to address these enumerated concerns.
 - 3. A copy of the proposed revised Summary Notice is attached as Exhibit 1.

- 4. A copy of the proposed revised "Unknown Claims" language is attached as Exhibit 2.
- 5. Regarding international class members, the Parties propose one time publication notice in the International Herald Tribune.
- 6. Regarding the issue of counsel fees, Class Counsel confirms that the Court's disposition of any motion for costs and fees will not impact the finality of Final Approval of the approved settlement.
 - 7. Further, Class Counsel agree to reduce their fee request from \$84,000 to \$74,000.

Respectfully Submitted,

/s/ Robert B. Calihan Robert B. Calihan, Esquire rcalihan@calihanlaw.com

CALIHAN LAW 16 W. Main Street Rochester, N.Y. 14614 (p)(585) 232-5291

/s/ Bruce Carlson
R. Bruce Carlson, Esquire
(admitted pro hac vice)
bcarlson@carlsonlynch.com

CARLSON LYNCH LTD 231 Melville Lane P.O. Box 367 Sewickley, PA 15143 (p) (412) 749-1677 (f) (412) 749-1686

Counsel for Plaintiff